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December 9, 2020

Bureau of Land Management Ely District Office
Attn: Ben Noyes, Wild Horse and Burro Specialist
702 N. Industrial Way
Ely, Nevada 89301

Via email: BLM_NV_Ely_PancakeComplex_WildHorseGatherEA@blm.gov

RE: *White Pine County, Nevada Comments to the Preliminary Pancake Complex Wild Horse Gather Environmental Assessment*

Dear Mr. Noyes:

White Pine County, Nevada (County) offers these comments to the Bureau of Land Management's (BLM's) Preliminary Pancake Complex Wild Horse Gather Environmental Assessment (EA). Of the approximately 5.7 million acres that make up the County, about 4.5 million acres are public lands managed by the BLM. BLM-managed public land in the County supports multiple uses, critical watersheds, scenic values, and critical wildlife habitat.

The above listed values help support the County's customs, culture, and economy. All of these values are at risk of irreparable harm in areas where wild horse and burro populations exceed the Appropriate Management Levels (AMLs) that are established through recognized scientific methods, in addition to the recognition and consideration of other multiple use values. Further, the County advocates a position that wild horse and burro populations that reside outside of designated Herd Management Areas (HMAs), commonly referred to as Herd Areas (HAs), be managed for zero (0) wild horses and/or burros. This position is captured in the County's Public Lands Policy Plan as follows:

6. Wild horses

Policy 6-2: Manage wild horses to reduce detrimental impacts to other multiple uses. Potential adverse effects on private lands, rangelands, wildlife habitat, and water sources should be avoided or properly mitigated.

A review of the preliminary EA indicates the following findings:

- The Purpose and Need included in the preliminary EA is consistent with the County's adopted policies relating to the management of wild horses.
 - To this end, the County requests that its 2018 Public Land Policy Plan be cited in the EA as a local plan that is consistent with the Proposed Action. A copy of this plan may be accessed online at: <http://www.whitepinecounty.net/470/Natural-Resources>.
- The Proposed Action (Alternative A) includes an all-tools approach to gather and remove excess wild horses in the Pancake HA over a period of ten (10) years.

- The expected results from the No Action Alternative and Alternatives B, C, and D would not be consistent with the 2008 BLM Ely District (EYDO) Resource Management Plan (RMP), the 1971 Wild and Free Roaming Horse and Burro Act (WFRHBA), or the Northeastern Great Basin Area RAC Standards and Guidelines for Rangeland Health.
- The document thoroughly evaluated and explained across five pages why nine additional and distinct alternatives were considered but were not carried forward for detailed analysis in the preliminary EA.
- The rangeland monitoring data reported in the preliminary EA substantiated the rationale and justification used in the 2008 EYDO RMP to designate the:
 - Pancake Use Area as a Herd Management Area (HMA) as opposed to a Herd Area (HA), and to manage the Pancake HMA for the AML of wild horses or burros; and,
 - Jakes Wash Horse Use Area as a HA, as opposed to a HMA, and to manage the Jakes Wash HA for no wild horses or burros;
 - Sand Springs West Horse Use Area as a HMA, as opposed to a HA, and to manage the Sand Springs West HMA for the AML of wild horses or burros; and,
 - Monte Cristo Wild Horse Territory (WHT) as a HMA, as opposed to a HA, and to manage the Monte Cristo WHT HMA for the AML of wild horses or burros.
- The plus 100-page document contained sufficient resource information and analyses to allow the agency decision-maker to make a well-informed resource decision pertaining to the identified purpose and need and for the general public to understand the effects that the alternatives considered in the preliminary EA would have on the human environment.

Based on these findings, the County supports the adoption of the Proposed Action and voices its opposition to the No Action Alternative. Beyond this initial recommendation, the County hopes the Proposed Action specific to getting horse populations within AML is completed as soon as possible to reduce current and ongoing resource degradation. The County further ask the BLM to closely review and carefully consider comments that may be submitted by the N-4 State Grazing Board and potentially affected County citizens and public land ranchers that may respond to the preliminary EA.

The County appreciates this opportunity to review and provide comments to this important document and lends our support for rapid implementation and completion of the Proposed Action. If you have any questions regarding this letter or require further information, please contact the County's consultant, Jeremy Drew with Resource Concepts, Inc. at (775) 883-1600.

Respectfully,



Richard Howe, Chair
White Pine County Board of Commissioners

RH/jld/klu

cc: N-4 State Grazing Board
Nevada Association of Counties
White Pine County Public Land Use Advisory Committee